

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

D.V.D.; M.M.; E.F.D.; and O.C.G.,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY;
Kristi NOEM, Secretary, U.S. Department of
Homeland Security, in her official capacity; Pamela
BONDI, U.S. Attorney General, in her official
capacity; and Antone MONIZ, Superintendent,
Plymouth County Correctional Facility, in his official
capacity,

Defendants.

Civil Action No. 25-cv-10676-BEM

**AUTHENTICATING DECLARATION OF TRINA REALMUTO
IN SUPPORT OF PLAINTIFFS' EMERGENCY MOTION FOR TEMPORARY
RESTRAINING ORDER AND PRELIMINARY INJUNCTION ON BEHALF OF
PLAINTIFF O.C.G.**

Pursuant to 28 U.S.C. § 1746, I hereby declare:

1. I am the executive director of the National Immigration Litigation Alliance. I am one of the counsel for Plaintiffs and class members in the above-captioned case. I submit this declaration in support of Plaintiffs' Emergency Motion for a Temporary Restraining Order and Preliminary Injunction on Behalf of Plaintiff O.C.G.
2. I have personal knowledge of the facts set forth herein, and, if called as a witness, I could and would testify completely as set forth below.
3. Accompanying this declaration as **Exhibit A** is a true and correct copy of a partially redacted version of Defendants' amended responses to Plaintiffs' written discovery requests. Defendants' counsel Mary L. Larakers emailed the amended responses to Plaintiffs' counsel on Friday, February 16 at 9:46 PM ET. Defendants designated the document as "CONFIDENTIAL SUBJECT TO PROTECTIVE ORDER."
4. Pursuant to the Protective Order for Expedited Discovery Related to Plaintiff O.C.G., *see* Dkt. 96, Plaintiffs' counsel emailed Defendants' counsel to request that Defendants lift the confidentiality designation on the attached document, which redacts the names of the deportation officers mentioned in the document excluding Brian Ortega and the name of the individual who verified the responses.
5. Defendants' counsel agreed that, with these redactions, the amended discovery responses could be filed on the public docket unsealed.

I declare under penalty of perjury that the above information is true and correct to the best of my knowledge. Executed this 19th day of May 2025 at Brookline, Massachusetts.

By: s/ Trina Realmuto
Trina Realmuto